

Gayle Hubert has confirmed this meeting

Begins: 11/14/2000 01:00 PM Local Time
Ends: 11/14/2000 02:00 PM Local Time

Title: Quarterly Conference Call with KDHE
Location: Rm 3145

Chair: Gayle Hubert/ARTD/R7/USEPA/US

To (required): John Delashmit/ARTD/R7/USEPA/US@EPA; Harry Gabbert/ARTD/R7/USEPA/US@EPA; Scott Ritchey/ARTD/R7/USEPA/US@EPA; AndreaR Stone/ARTD/R7/USEPA/US@EPA; Ken Herstowski/ARTD/R7/USEPA/US@EPA; Martin Kessler/ARTD/R7/USEPA/US@EPA; David Garrett/ARTD/R7/USEPA/US@EPA; Jeremy Johnson/ARTD/R7/USEPA/US@EPA; Jeff Johnson/ARTD/R7/USEPA/US@EPA; Wray Rohrman/ARTD/R7/USEPA/US@EPA; Bill Lowe/ARTD/R7/USEPA/US@EPA; Demetra Salisbury/ARTD/R7/USEPA/US@EPA; Gayle Hubert/ARTD/R7/USEPA/US@EPA; Stephanie Doolan/ARTD/R7/USEPA/US@EPA; Patricia Murrow/ARTD/R7/USEPA/US@EPA; John Smith/ARTD/R7/USEPA/US@EPA; Harriett Jones/ARTD/R7/USEPA/US@EPA

cc (optional):

Description

I am attaching the final agenda for tomorrow's call to discuss RCRA INFO and status of Permit Baseline and approved controls. If you are attending, please be prepared to discuss your project if it comes up in our discussion. I am anticipating that we will discuss Vulcan and the surface impoundment closure issue. If there are any other permitting issues to discuss with KDHE, tomorrow's your chance



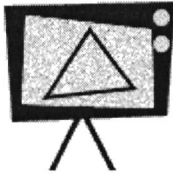
nov00agd.wpd

Note that the Room has been changed to 3145. Come and discuss any site specific issues tomorrow with KDHE.

*EPA & KDHE
Email on
questions.
Surface Impoundment*



R00176635
RCRA RECORDS CENTER



Gayle Hubert

11/03/00 09:24 AM

To: David Garrett/ARTD/R7/USEPA/US@EPA

cc:

Subject: Re: Vulcan Surface Impoundment and 10/17/00 Vulcan meeting

FYI I sent another e-mail about the LP-2 impoundment. I STILL need to know if the impoundment was clean closed or closed with waste in place. I asked for them to make a decision on that but from the sound of Everett's e-mail, he is done. Could you check up on their final answer for me? Thanks.

----- Forwarded by Gayle Hubert/ARTD/R7/USEPA/US on 11/03/00 09:28 AM -----



ESpellma@kdhe.state
.ks.us

11/02/00 01:58 PM

To: Gayle Hubert/ARTD/R7/USEPA/US

cc:

Subject: Re: Vulcan Surface Impoundment and 10/17/00 Vulcan meeting

Gayle,

Gayle, I have sent you information documenting the clouser activities for surface impoundment LP-2. I will initiate procedures to delete the 1,000,000,000 gallon surface impoundment from the RCRIS data base. At this point, I am considering this issue completed.

Hubert.Gayle@epama
il.epa.gov

To: ESpellma@kdhe.state.ks.us

cc: Garrett.David@epamail.epa.gov,

11/02/00 10:57 AM DDegner@kdhe.state.ks.us, MKamal@kdhe.state.ks.us

Subject: Re: Vulcan Surface Impoundment and
10/17/00 Vulcan meeting

Everett,

Thanks again for your info. Do you have information that LP-2 was Clean Closed?

We didnt see any documents to verify the clean closure status appearing in the old RCRIS file.

Gayle



ESpellma@kdhe.state
.ks.us

11/01/00 11:32 AM

To: Gayle Hubert/ARTD/R7/USEPA/US

cc: David Garrett/ARTD/R7/USEPA/US, MKamal@kdhe.state.ks.us,
DDegner@kdhe.state.ks.us

Subject: Re: Vulcan Surface Impoundment and 10/17/00 Vulcan meeting

Gayle,

I have documentation stating that the interim status surface impoundment known as LP-2 was closed in 1984. I will send you a copy. This surface impoundment is not the one in question.

The unit in question is the 1,000,000,000 gallon surface impoundment. There is no evidence in the facility file that this impoundment exists and no surface impoundments are included in the facility's permit. Unless you are referring to a specific surface impoundment at the facility, it is our opinion that the RCRIS data base is in error. Therefore, KDHE will modify the RCRIS data base by removing reference to this impoundment.

Hubert.Gayle@epama

il.epa.gov

To: ESpellma@kdhe.state.ks.us

cc: Garrett.David@epamail.epa.gov,

10/25/00 04:45 PM

Mostafa_Kamal.kdhe.state.ks.us@epamail.epa.gov

Subject: Re: Vulcan Surface Impoundment and
10/17/00 Vulcan meeting

Everett,

Thanks for the background information. That certainly helps us get closer to figuring out the surface impoundment issue. The remaining issue involves the interim status surface impoundment that was clean closed as indicated in the RCRIS database. We could not find any documents that stated that clean closure was accepted in your files or in ours. In fact, we couldnt even find the closure plan. The last discussion we had at the Multi-year strategy meeting,

Mostafa said that the impoundment was not clean closed. What is left to determine is the closure status of the interim status surface impoundment. If

it was closed with waste in place, then we need to come up with a plan for getting it under approved controls (under a post-closure permit, post-closure

plan, or consent order that requires post closure care) and you will need to change the status in RCRAInfo. If you can find the clean closure documents, then we will leave it as is. Thanks for your research and help with this issue.

Gayle Hubert,
EPA State Coordinator, ARTD/RCAP

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| To:   David Garrett/ARTD/R7/USEPA/US
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| cc:   Gayle Hubert/ARTD/R7/USEPA/US, MKamal@kdhe.state.ks.us,
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|       DDegner@kdhe.state.ks.us
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| Subject: Re: Vulcan Surface Impoundment and 10/17/00 Vulcan
|
|        meeting
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David,

Additional information is needed to properly address your question concerning the status of the surface impoundment. The file documents the presence of numerous basins during past operations. Various documents refer to these basins using multiple terminology. For example, surface impoundments were referred to as basins, ponds, retention ponds, lined ponds, storm water runoff ponds, lagoons, or any combination of these phrases. Therefore, it is important to specify the surface impoundment to which you are referring.

The RCRIS data base lists two surface impoundments at Vulcan, one as an interim status impoundment that has clean been closed, and the other is a permitted 1,000,000,000 gallon surface impoundment with an effective date of December 19, 1986. This is the same date KDHE issued a permit, but that

surface impoundment was not included in the permit.

Three surface impoundments, known as LP-1, LP-2, and LP-3, were identified in the facility file, but these impoundments were not included as regulated units in the 1986 permit. Vulcan submitted a Part A application which states that these surface impoundments were used for process area surface water runoff that was not considered to be hazardous. In addition, the responsive summary to a question raised during an August 27, 1986 public hearing stated that sampling would be collected and analyzed to assure that they contain no hazardous waste. (The results from these analyses were not located.)

If these are the impoundment you are referring to at the facility, our conclusion is that the RCRIS data base is incorrect.

In response to your other question, reference to Section 9(C) of EPA's Part II permit may help you determine the appropriate list of analytical parameters. This section requires Vulcan to analyze samples for the list of parameters specified in KDHE's order.

Your second question is related to the issue of project management. What has been determined concerning the lead agency for this facility? It is our opinion that KDHE's order is no longer effective due to the corrective action process. Therefore EPA has the lead on all groundwater related issues. You were to investigate this issue for EPA and respond. What is your conclusion?

Mostafa Kamal

To: Everett Spellman/Kdhe@Kdhe

10/17/00 cc: Dennis Degner/Kdhe

03:22 PM Subject: Vulcan Surface

Impoundment
and

10/17/00 Vulcan meeting

Please review the enclosed email from EPA and let me know what your findings are.

----- Forwarded by Mostafa Kamal/Kdhe on 10/17/00 03:00 PM -----

Garrett.David@epamail

il.epa.gov To:

mkamal@kdhe.state.ks.us

cc:

Hubert.Gayle@epamail.epa.gov

10/17/00 02:52 PM

Subject: Vulcan Surface

Impoundment and

10/17/00 Vulcan meeting

I had not heard from you regarding my 9/15/00 email to you. This email was about EPA Region 7 continued questions on the question about Vulcan's surface

impoundment issue (see below message). Please respond back with your comments.

If the surface impoundment has been clean closed, please send us a copy of the pertinent data/documentation.

Also I had a meeting with Vulcan today regarding CA and other issues i.e. Abbott. Anyway, I had a question for Kay Johnson concerning the 27 constituents that are sampled for during each semi-annual GW sampling event. The 1986 KDHE

Administrative Order covers 2-3 pages of constituents that are supposed to be

sampled and analyzed for. Approximately one half of these KDHE constituents are

not being sampled/analyzed. Kay said that Vulcan believes that they have completed 100% of the requirements listed by KDHE in their 1986

Administrative

Order via discrete submittals since 1986. This was her justification for their

not sampling for all 100% of the 1986 KDHE Administrative Order listed contaminants. Are you aware of this? Does KDHE agree or have any responses?

You should receive this week, the EPA comments on the Offsite CMS GW reports.

Please feel free to call me regarding Vulcan issues.

David Garrett
Environmental Scientist
EPA Region 7: Air, RCRA, Toxics Division
RCRA Corrective Actions and Permitting Branch
901 N. Fifth St.
Kansas City, KS. 66101

Phone (913) 551-7159

Fax (913) 551-7947

----- Forwarded by David Garrett/ARTD/R7/USEPA/US on 10/17/00 02:45 PM

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	David Garrett
	09/15/00
	01:31 PM
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| To: mkamal@kdhe.state.ks.us

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| cc: Gayle Hubert/ARTD/R7/USEPA/US@EPA
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| Subject: Vulcan Surface Impoundment
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Good afternoon,

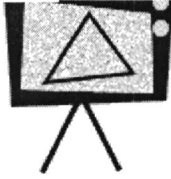
Mostafa, I thought that I would get with you regarding the surface impoundment status at Vulcan. Gayle and I spoke with Everett awhile ago regarding this. We did not see anything regarding this issue on the Kansas Multi-Year Permit and Corrective Action Strategy for Vulcan Chemicals. When and how are we going to get approved controls on the surface impoundment? We would like to see this issue put to rest.

Your support and help would be appreciated.

Thank you and have a good day!

David Garrett
EPA Region 7: Air, RCRA, Toxics Division
RCRA Corrective Actions and Permitting Branch
901 N. Fifth St.
Kansas City, KS. 66101

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Fax (913) 551-7947



Gayle Hubert

10/25/00 04:45 PM

To: ESpellma@kdhe.state.ks.us

cc: David Garrett/ARTD/R7/USEPA/US@EPA, Mostafa
Kamal@kdhe.state.ks.us

Subject: Re: Vulcan Surface Impoundment and 10/17/00 Vulcan meeting



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EPA State Coordinator, ARTD/RCAP
ESpellma@kdhe.state.ks.us



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10/25/00 03:58 PM

To: David Garrett/ARTD/R7/USEPA/US

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10/17/00 cc: Dennis Degner/Kdhe
03:22 PM Subject: Vulcan Surface Impoundment and
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To: mkamal@kdhe.state.ks.us

cc: Gayle Hubert/ARTD/R7/USEPA/US@EPA

Subject: Vulcan Surface Impoundment

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